

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In re:

ALFRED ROBINSON

Case No. 18-28034 E

Chapter 13

Adv. Proc. No.

Debtor(s)

ALFRED ROBINSON

Plaintiff/Debtor

Vs.

CARRINGTON MORTGAGE

Defendant/Creditor

**PLAINTIFF'S COMPLAINT FOR TEMPORARY RESTRAINING ORDER ENJOINING
SALE, ENCUMBERING OR DISPOSITION OF REAL PROPERTY**

Plaintiff, the above-named chapter 13 Debtor(s), alleges as follows:

1. This is an adversary proceeding pursuant to Bankruptcy Rule 7001 and arises out of and is related to Debtor's Chapter 13 bankruptcy case. This Court has jurisdiction over this core proceeding pursuant to 28 U.S.C. Secs. 157 and 1334, and by virtue of 11 U.S.C. Secs. 506(a) and 1322(b).
2. That on September 26, 2018 Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
3. That Debtor's attorney has provided a copy of the notice of filing along with a copy of this Complaint to the attorneys for Carrington Mortgage, namely Rubin Lublin. The sale of the property is currently scheduled for Thursday, September 27, 2018.
4. That Debtor would be unduly harmed if the sale were to take place and, also, that the Debtor is now working and collecting room rent, in addition to receiving Social Security, and is able to make plan payments as proposed.

WHEREFORE DEBTOR PRAYS AS FOLLOWS,

For the Court to set a hearing on this matter, that the Court issue an order granting a Temporary Restraining Order against Carrington Mortgage to stop the disposition or sale of the Debtor's principal residence, known as 5144 Lexie Drive, Memphis TN 38116, and for any other relief to which the Debtor may be entitled.

/s/ Brian W. Lynn

Brian W. Lynn

P.O. Box 111064

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(901) 791-1485

CERTIFICATE OF SERVICE

On September 26, 2018, a copy of the foregoing was served via United States Mail (Certified Mail) or electronically to the **Debtor(s); Carrington Mortgage; Rubin Lublin**; and to **Case Trustee**.

/s/ Brian W. Lynn

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